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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

EPIC GAMES, INC.,

Plaintiff, Counter-defendant,

v.

APPLE INC.,

Defendant, Counterclaimant.

Case No. 4:20-CV-05640-YGR-TSH

**JOINT STIPULATION AND [PROPOSED]
ORDER MODIFYING THE PRIVILEGE RE-
REVIEW PROTOCOL**

Courtroom: 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

JOINT STIPULATION
AND [PROPOSED] ORDER MODIFYING
THE PRIVILEGE RE-REVIEW PROTOCOL

CASE No. 4:20-CV-05640-YGR-TSH

1 WHEREAS, on December 23, 2024, the Court entered the Joint Stipulation and Order
2 Approving Privilege Re-Review Protocol (the “Protocol”) (Dkt. 1092); and

3 WHEREAS, the Protocol establishes that objections to Special Master determinations are
4 generally to be filed within four court days from the issuance of such determinations;

5 WHEREAS Epic Games, Inc. (“Epic”) is unable to evaluate or object to Special Master
6 determinations upholding redactions for privilege before Apple Inc. (“Apple”) produces to Epic the
7 document subject to such redactions; and

8
9 WHEREAS pursuant to the Protocol, Apple may produce documents to Epic after the four-
10 day objection period has passed;

11 **THEREFORE, IT IS STIPULATED AND AGREED THAT:**

12 1. Notwithstanding the time limits set forth in paragraph 4(a) of the Protocol, the
13 deadline for Epic to object to a Special Master ruling on a redacted document will be four (4) court
14 days from the date of production of such document by Apple to Epic, irrespective of the date of the
15 Special Master’s ruling;

16 2. Notwithstanding the above, Epic may object on or before March 14, 2025, to any
17 Special Master rulings that (i) were issued on or after February 12, 2025, (ii) upheld Apple’s
18 proposed redactions, and (iii) pertained to documents that Apple produced to Epic on or prior to
19 March 10.
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28 JOINT STIPULATION
AND [PROPOSED] ORDER MODIFYING
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Dated: March 13, 2025

Respectfully submitted,

By: /s/ Yonatan Even

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Respectfully submitted,

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1 **PURSUANT TO THE FOREGOING STIPULATION AND GOOD CAUSE APPEARING,**
2 **IT IS SO ORDERED.**

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4 Dated: _____

HON. YVONNE GONZALEZ ROGERS

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E-FILING ATTESTATION

I, Yonatan Even, am the ECF User whose ID and password are being used to file this document.
In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified
above has concurred in this filing.

/s/ Yonatan Even

Yonatan Even

JOINT STIPULATION
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